

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

DEONTE JAMES,)	CASE NO. 1:21-cv-01958
)	
Plaintiff,)	JUDGE J. PHILIP CALABRESE
)	
vs.)	
)	
CUYAHOGA COUNTY, <i>et al.</i> ,)	
)	
Defendants)	

**DEFENDANT CUYAHOGA COUNTY’S NOTICE OF COMPLIANCE
WITH COURT’S ORDER RELATING TO PRODUCTION OF VIDEOS AND SERVICE
OF SUPPLEMENTAL DISCOVERY RESPONSES**

Defendant Cuyahoga County (the “County”) hereby provides notice that, on March 15, 2023, the County completed the process of identifying and producing all of the video recordings in its possession relating to the 60 use of force incidents that were ordered by the Court to be produced to Plaintiff. Upon an extensive and time-consuming search of its body camera and surveillance camera databases, the County identified and produced 196 videos relating to 49 of the incidents, but was not able to locate any body camera video recordings or surveillance camera video recordings for 11 of the use-of-force incidents. In so doing, the County has supplemented its Answers to Plaintiff’s Request for Admissions and Interrogatories with two Declarations from the Associate Warden for the Cuyahoga County Correctional Center, and the Security Systems Analyst at the Cuyahoga County Department of Informational Technology, that explain the searches that were performed to locate the videos, and why no videos of the 11 use-of-force incidents exist. A copy of the supplemental discovery responses with the attached Declarations are attached hereto for the Court’s reference.

This Notice is being filed with the Court because the County's production of the videos is one of the topics listed in the Court's Order, dated March 13, 2023, that will be addressed at the upcoming Hearing on April 6, 2023. Moreover, since Plaintiff's counsel has filed a Notice today that requests that the Court address the adequacy of Defendant's discovery responses at the April 6th Hearing, the undersigned counsel conferred with Plaintiff's counsel today by telephone and discussed the fact that the County would be serving supplemental discovery responses upon Plaintiff's counsel today, and would be filing a copy of the supplemental discovery responses with the Court.

Respectfully submitted,

/s/ Stephen W. Funk

Stephen W. Funk (0058506)
ROETZEL & ANDRESS, LPA
222 S. Main Street, Suite 400
Akron, Ohio 44308
Telephone: 330.849.6602
E-mail: sfunk@ralaw.com

Attorney for Cuyahoga County, Ohio

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of March, 2023, a copy of the foregoing Notice was electronically filed with the Court. Notice of this filing was sent to all counsel of record via the Court's electronic filing system.

s/ Stephen W. Funk